

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHAWN GOWDER,)	
)	
Plaintiff,)	
)	
v.)	
)	No. 11-cv-1304
CITY OF CHICAGO, a municipal corporation,)	
the CITY OF CHICAGO DEPARTMENT OF)	Judge Der-Yeghiayan
ADMINISTRATIVE HEARINGS, MUNICIPAL)	
HEARINGS DIVISION, SCOTT V. BRUNER,)	
Director of the City of Chicago Department of)	
Administrative Hearings, the CITY OF CHICAGO)	
DEPARTMENT OF POLICE, and JODY P. WEIS,)	
Superintendent of the City of Chicago Department)	
of Police,)	
)	
Defendants.)	

**AGREED MOTION TO SET LR 54.3 SCHEDULE
RELATING TO MOTION FOR ATTORNEY'S FEES**

Pursuant to Local Rule 54.3 and Federal Rule of Civil Procedure 54, plaintiff Shawn Gowder, by and through his attorney, Stephen A. Kolodziej, hereby files this Agreed Motion to Set LR 54.3 Schedule Relating to Motion for Attorney's Fees, and in support hereof states as follows:

1. The Court entered summary judgment in favor of plaintiff on June 19, 2012 [Doc. # 67]. Pursuant to Northern District of Illinois Local Rule 54.3 ("LR 54.3"), the parties to this litigation are required to meet and confer regarding any potential motion by a party for the award of fees and/or costs. Local Rule 54.3 sets forth certain deadlines for the parties to exchange information, confer regarding objections to certain fee requests, and to create a joint statement regarding the fee request. Under LR 54.3(b), the Court may modify the deadlines set forth in LR 54.3.

2. The undersigned counsel for plaintiff and counsel for defendants have jointly conferred and agreed regarding an appropriate schedule for meeting LR 54.3's requirements.

3. Based on the parties' agreement on an appropriate schedule for compliance with LR 54.3, Plaintiff requests that the Court enter the following schedule with regard to LR 54.3's requirements:

July 31, 2012 – Plaintiff shall comply with Local Rules 54.3(d)(1)-(4) by providing Defendants all information required under such Rules.

August 31, 2012 – If necessary, Defendants shall comply with the first paragraph of Local Rule 54.3(d)(5) and subsections (A)-(D) thereunder, by providing Plaintiff all information required under such rules.

October 1, 2012 – If necessary, the parties shall comply with Local Rule 54.3(d)(5) by: (1) identifying all hours, billing rates, or related nontaxable expenses (if any) that will and will not be objected to, the basis of any objections and the specific hours, billing rates, and related nontaxable expenses that in the parties' respective views are reasonable and should be compensated; and (2) attempting to resolve any remaining disputes.

October 31, 2012 – The parties shall comply with Local Rule 54.3(e) by filing a joint statement setting forth the information specified in such Rule.

November 21, 2012 – If necessary, Plaintiff shall file his motion for attorneys' fees.

4. The foregoing schedule has been agreed to by the parties based upon their schedules and obligations in other cases, including *NRA, et al. v. City of Chicago*, No. 08 C 3696, in which the parties' counsel in this case are also counsel of record. The Court in that case recently entered a ruling on the plaintiffs' motion for attorney's fees which required plaintiffs to redact and re-submit billing records and an adjusted fee total by July 12, 2012, and defendants to file any objections to those redacted records and total by July 26, 2012. In addition, the undersigned counsel for plaintiff switched law firms as of January 1, 2012, and is still in the process of obtaining his billing records and totals from his previous law firm for fees incurred prior to January 1, 2012. The proposed schedule above has been agreed upon with the intent to avoid

the necessity of seeking further extensions from the Court.

WHEREFORE, Plaintiff respectfully requests that the Court enter an order setting the above schedule for the parties to comply with LR 54.3 and Federal Rule of Civil Procedure 54.

Respectfully submitted,

s/ Stephen A. Kolodziej

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Attorney for Plaintiff Shawn Gowder

CERTIFICATE OF SERVICE

I, Stephen A. Kolodziej, an attorney, under penalty of perjury, state that on June 29, 2012, service is being made in accordance with the General Order on Electronic Case Filing section XI to the following:

Rebecca Alfert Hirsch
Andrew W. Worseck
Assistant Corporation Counsel
City of Chicago Department of Law
30 N. LaSalle Street, Suite 1230
Chicago, IL 60602

s/ Stephen A. Kolodziej _____
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